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October 24, 2022

VIA ECF

Honorable Frederick J. Scullin, Jr.
United States District Judge
Northern District of New York
James M. Hanley Federal Building & U.S. Courthouse
100 S. Clinton Street
Syracuse, New York 13261

Re: *Southwestern Payroll Service, Inc. v. Pioneer Bancorp, Inc. et al.*,
Northern District of New York, Case No. 1:19-cv-1349 (FJS/CFH)

Dear Judge Scullin:

I write on behalf of Plaintiffs National Payment Corporation and Southwestern Payroll Service, Inc. respectfully to request leave to file a joint, ten-page reply brief in response to Defendants Pioneer Bancorp, Inc. and Pioneer Bank's 50-page brief filed in opposition to Plaintiffs' appeals from Magistrate Judge Hummel's September 12, 2022 Memorandum-Decision and Order denying Plaintiffs' motions for leave to file amended complaints (Dkt. No. 197, the "Order").

While a motion to amend is considered a non-dispositive motion, the Order is dispositive of Plaintiffs' proposed allegations that support their existing claims and proposed new claims derived from evidence obtained during discovery. Moreover, Defendants have raised grounds for affirming the Order that Plaintiffs have not had the ability to address. Accordingly, Plaintiffs respectfully request that the Court grant Plaintiffs leave to file a joint reply brief in further support of their appeals (Dkt. Nos. 199, 200).

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

GREENBERG TRAURIG, LLP

A handwritten signature in blue ink that reads "Cynthia Neidl".

Cynthia E. Neidl

cc: All parties of record (via ECF)
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